

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Selena Boston, Jalisa Rhodes,)
Lutisha Martinez, and Lanette Washington,)

Plaintiffs,)

v.)

Micah Sierra 'Katt' Williams, Tatiana)
Smith and John Doe 1-15,)

Defendant.)

CIVIL FILE ACTION NO.
1:23-CV-0752

**PLAINTIFFS' MOTION FOR LEAVE TO FILE THE CORRECT BRIEF
OR ALTERNATIVELY, PLAINTIFFS' AMENDED BRIEF IN OPPOSITION
TO DEFENDANT MICAH "KATT" WILLIAMS'
MOTION FOR SUMMARY JUDGMENT**

COMES NOW Selena Boston, Jalisa Rhodes, Lutisha Martinez and Lanette Washington, plaintiffs in the above-styled case, by and through their undersigned counsel, and files their Motion for Leave to File the Correct Brief or Alternatively, Plaintiffs' Amended Brief in Opposition to Defendant Micah "Katt" Williams' Motion For Summary Judgment and state as follows:

1.

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, plaintiffs respectfully move this Honorable Court for leave to file the attached correct brief entitled "Plaintiffs' Amended Brief in Opposition to Defendant "Micah"

Williams' Motion for Summary Judgment. (See attached Exhibit "A" – Plaintiffs' Amended Brief in Opposition to Defendant Micah "Katt" Williams' Motion for Summary Judgment.

2.

In other words, plaintiffs seek to replace the previous and erroneously filed brief [Dkt. 57] with the correct attached Amended Brief.

3.

The undersigned inadvertently uploaded and electronically filed the wrong version of plaintiffs' brief as a result of being distracted by a number of simultaneous life challenges. (See attached Declaration of Loletha Denise Hale).

4.

The attached Amended Brief in Opposition to Defendant Micah "Katt" Williams' Motion for Summary Judgment would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.

5.

To ensure the Defendant is not prejudiced, plaintiffs hereby consent to this Court granting Defendant additional time to amend his Reply, if he desires to do so.

6.

Rule 15 provides that “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2).

7.

Plaintiffs respectfully request that this Honorable Court grant Plaintiffs leave to file their attached Amended Brief in Opposition to Defendant Micah “Katt” Williams’ Motion for Summary Judgment.

Submitted this the 19th day of August 2025.

HALE LAW FIRM, P.C.

/s/LOLETHA DENISE HALE
LOLETHA DENISE HALE, ESQ.
Georgia Bar No. 317523

Attorney for Plaintiffs
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Jonesboro, Georgia 30237
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the within and foregoing
**PLAINTIFFS' MOTION FOR LEAVE TO FILE THE CORRECT BRIEF OR
ALTERNATIVELY, PLAINTIFFS' AMENDED BRIEF IN OPPOSITION TO
DEFENDANT MICAH "KATT" WILLIAMS' MOTION FOR SUMMARY
JUDGMENT** upon opposing

counsel via the CM/ECF system, and addressed as follows:

Gabe Banks, Esq.
100 Peachtree Street NW Suite 260
Atlanta, GA 30303
Ph: 404-891-9280
Email:

This the 19th day of August 2025.

HALE LAW FIRM, P.C.

/s/Loletha Denise Hale
LOLETHA DENISE HALE, ESQ.
Georgia Bar No. 317523

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Email:

LR 5.1 CERTIFICATION

The above-signed counsel certify that this document has been prepared with
14 point Times New Roman Font.